

**FOLEY & LARDNER LLP**

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Attorneys for Shanghai Inteva Automotive Door Systems Company, Ltd.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Chapter 11
	)	
DPH HOLDINGS CORP., et al.,	)	Case No. 05-44481 (RDD)
	)	
Reorganized Debtors.	)	(Jointly Administered)
	)	

**SHANGHAI INTEVA AUTOMOTIVE DOOR SYSTEMS COMPANY, LTD.'S  
RESPONSE TO REORGANIZED DEBTORS' FORTY-FIRST OMNIBUS OBJECTION  
PURSUANT TO 11 U.S.C. § 503(B) AND FEDERAL RULE OF BANKRUPTCY  
PROCEDURE 3007 TO EXPUNGE CERTAIN (A) SEVERANCE CLAIMS AND (B)  
BOOKS AND RECORDS CLAIMS ASSERTING ADMINISTRATIVE EXPENSES**

Shanghai Inteva Automotive Door Systems Company, Ltd. ("SDADS" f/k/a Shanghai Delphi Automotive Door Systems), by and through its attorneys, Foley & Lardner LLP, files this Response (the "Response") to the above-captioned Reorganized Debtors' Forty-First Omnibus Objection Pursuant to 11 U.S.C. § 503(b) and Fed. R. Bankr. P. 3007 to Expunge Certain (A) Severance Claims and (B) Books and Records Claims Asserting Administrative Expenses (the "Forty-First Omnibus Objection"). In support of this Response, and in support of SDADS's July 13, 2009 proof of administrative expense claim and November 4, 2009 amended proof of administrative expense claim filed against the Debtors, SDADS respectfully states as follows:

## **I. BACKGROUND**

### **A. SDADS's business relationship with the Debtor**

1. On October 8 and 14, 2005, Delphi Corporation and certain of its affiliates (the "Debtors"), predecessors of the Reorganized Debtors, filed voluntary petitions for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101-1330 (the "Bankruptcy Code"). On June 1, 2009, the Debtors sought approval of certain modifications to a plan of reorganization that was confirmed on January 25, 2009 (the "Modified Plan"). This Court entered an order approving the Modified Plan on July 30, 2009.

2. On October 6, 2009, the Debtors substantially consummated the Modified Plan and the Effective Date occurred.

3. On December 21, 2009, the Reorganized Debtors filed their Forty-First Omnibus Objection.

4. The Debtors were in the business of, among other things, manufacturing certain automobile parts. SDADS (formally known as Shanghai Delphi Automotive Door Systems, a joint venture the Debtors arranged with Shanghai Automotive Industrial Corporation) supplied automotive parts to the Debtors and continued to supply the Debtors up and until the Debtors sold their Interiors and Closures Business (the "Business"), as well as their share of the joint venture described above, to Inteva Products, LLC on or about March 1, 2008. Upon the Debtors' sale of the Business, SDADS no longer supplied parts to the Debtor.

### **B. SDADS's Claim against the Debtors**

5. On July 13, 2009, SDADS filed a timely administrative expense claim against the Debtors, claim number 19139, in the amount of \$238,274.80 (the "Claim"). On November 4, 2009, SDADS filed an amended administrative expense claim against the Debtors, claim number 19994, in the same amount of \$238,274.80 (the "Amended Claim") and together with the Claim,

the “SDADS Claim”). The Amended Claim is identical to the Claim but included additional backup documentation including copies of the invoices supporting the total amount of the SDADS Claim. Specifically, from October 2006 through February, 2008, SDADS provided goods and services to the Debtors in the total amount of \$238,274.80 that remains unpaid and is reflected in the supporting invoices. A list summarizing the invoices constituting the SDADS Claim along with copies of each invoice are attached to the Amended Claim which is attached hereto as Exhibit A.

**C. The Objection to the SDADS Claim**

6. On December 21, 2009, the Reorganized Debtors, filed the Forty-First Omnibus Objection, objecting to the SDADS Claim. The Reorganized Debtors did not allege that SDADS held an invalid claim against the Debtors nor did they provide any evidence in support of their objection to the Claim. Rather, the Reorganized Debtors’ sole basis for objecting to the SDADS Claim is that the SDADS Claim “assert[s] liabilities and dollar amounts that are not reflected on the Reorganized Debtors’ book and records.” *See* Forty-First Omnibus Objection at ¶ 14.

**II. ARGUMENT**

7. A timely-filed proof of claim “shall constitute prima facie evidence of the validity and amount of the claim.” Fed. R. Bankr. P. 3001(f); *see also In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009) (“A proof of claim is prima facie evidence of the validity and amount of a claim, and the objector bears the initial burden of persuasion.”). To prevail on an objection to a proof of claim, any party objecting to the claim “has the burden of putting forth evidence sufficient to negate the prima facie validity of the claim by refuting one or more of the facts in the filed claim.” *In re St. Johnsbury Trucking Co., Inc.*, 206 B.R. 318, 323 (Bankr. S.D.N.Y. 1997); *see also Oneida*, 400 B.R. at 389 (finding that the burden only shifts to the

claimant if the objector produces “evidence equal in force to the prima facie case...which, if believed, would refute at least one of the allegations that is essential to the claim’s legal sufficiency) (quoting, *In re Allegheny Intern., Inc.*, 954 F.2d 167, 173-174 (3d Cir. 1992)).

8. Here, the SDADS Claim is prima facie valid as it was timely filed and contains supporting documentation for the amounts included in the proof of claim. In contrast, the only evidence that the Reorganized Debtors have submitted in support of their objection to the SDADS Claim is the conclusory assertion that the SDADS Claim is not owed based on the Reorganized Debtors’ books and records. The Reorganized Debtors’ mere assertion that the SDADS Claim is subject to disallowance does not rebut the prima facie validity of the SDADS Claim. The Reorganized Debtors’ objection to the SDADS Claim therefore should be disallowed with prejudice.<sup>1</sup>

WHEREFORE, SDADS respectfully requests that this Court enter an Order: (i) allowing the SDADS Claim as an administrative expense against the Debtors in the amount of \$238,274.80; (ii) overruling the Reorganized Debtors’ objection to the SDADS Claim and (iii) granting SDADS such other relief as this Court deems just and proper.

Dated: January 13, 2010

Respectfully submitted,

SHANGHAI INTEVA AUTOMOTIVE  
DOOR SYSTEMS COMPANY, LTD.

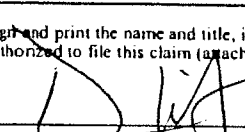
By: /s/ Judy A. O’Neill  
One of Its Attorneys

FOLEY & LARDNER LLP  
Judy A. O’Neill (admitted *pro hac vice*)  
Derek L. Wright  
321 North Clark Street  
Suite 2800  
Chicago, Illinois 60654  
Telephone: (312) 832-4500  
Facsimile: (312) 832-4700

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<sup>1</sup> SDADS reserves the right to submit additional evidence in support of the Claim in the event that this matter proceeds to a contested hearing.

# **EXHIBIT A**

<b>United States Bankruptcy Court</b> Southern District of New York Delphi Corporation et al. Claims Processing c/o Kurtzman Carson Consultants LLC, 2335 Alaska Avenue El Segundo, California 90245		<b>Administrative Expense Claim Form</b>		<b>THIS SPACE IS FOR COURT USE ONLY</b>
<b>Debtor against which claim is asserted:</b> Delphi Corporation, et al. 05-44481		<b>Case Name and Number</b> In re Delphi Corporation, et al. 05-44481 Chapter 11, Jointly Administered		
<b>NOTE: This form should not be used to make a claim in connection with a request for payment for goods or services provided to the Debtors prior to the commencement of the case. This Administrative Expense Claim Request form is to be used solely in connection with a request for payment of an administrative expense arising after commencement of the case but prior to June 1, 2009, pursuant to 11 U.S.C. § 503.</b>				
<b>Name of Creditor</b> <i>(The person or other entity to whom the debtor owes money or property)</i> SDADS (Shanghai Inteva Automotive Door Systems Company, Ltd.) Name and Address Where Notices Should be Sent Derek L. Wright, Esq., Foley & Lardner LLP 321 N. Clark Street, Suite 2800 Chicago, IL 60654 Telephone No. 312-832-4500		Check box if you are aware that anyone else has filed a proof of claim relating to your claim. Attach copy of statement giving particulars. <input type="checkbox"/> Check box if you have never received any notices from the bankruptcy court in this case. <input type="checkbox"/> Check box if the address differs from the address on the envelope sent to you by the court.		
<b>ACCOUNT OR OTHER NUMBER BY WHICH CREDITOR IDENTIFIES DEBTOR:</b>		Check here if this claim <input type="checkbox"/> replaces <input checked="" type="checkbox"/> amends a previously filed claim, dated: <u>7/13/09</u>		
<b>1. BASIS FOR CLAIM</b> Goods sold Services performed Money loaned Personal injury/wrongful death Taxes <input checked="" type="checkbox"/> Other (Describe briefly) <u>See Attached</u>		Retiree benefits as defined in 11 U.S.C. § 1114(a) Wages, salaries, and compensation (Fill out below) Your social security number _____ Unpaid compensation for services performed from _____ (date) to _____ (date)		
<b>2. DATE DEBT WAS INCURRED</b> <u>See Attached</u>		<b>3. IF COURT JUDGMENT, DATE OBTAINED:</b>		
<b>4. TOTAL AMOUNT OF ADMINISTRATIVE CLAIM: \$</b> <u>238,274.80</u> Check this box if claim includes interest or other charges in addition to the principal amount of the claim. Attach itemized statement of all additional charges.				
<b>5. Brief Description of Claim (attach any additional information):</b> <u>See Attached</u>				
<b>6. CREDITS AND SETOFFS:</b> The amount of all payments on this claim has been credited and deducted for the purpose of making this proof of claim. In filing this claim, claimant has deducted all amounts that claimant owes to debtor.				<b>THIS SPACE IS FOR COURT USE ONLY</b>
<b>7. SUPPORTING DOCUMENTS:</b> <i>Attach copies of supporting documents</i> , such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, court judgments, or evidence of security interests. <b>DO NOT SEND ORIGINAL DOCUMENTS.</b> If the documents are not available, explain. If the documents are voluminous, attach a summary. Any attachment must be 8-1/2" by 11".				
<b>8. DATE-STAMPED COPY:</b> To receive an acknowledgement of the filing of your claim, enclose a stamped, self-addressed envelope and copy of this proof of claim.				
<b>Date</b> <u>11/7/2009</u>		Sign and print the name and title, if any, of the creditor or other person authorized to file this claim (attach copy of power of attorney, if any)  Derek Wright (Counsel to Inteva as owner of SDADS)		

**Attachment to Amended Administrative Expense Claim Filed by Shanghai  
Inteva Automotive Door Systems Company, Ltd. ("SDADS" f/k/a Shanghai Delphi  
Automotive Door Systems)**

**Basis for Claim**

This administrative expense claim of SDADS is based on various purchase order agreements between Delphi Corporation (the "Debtor") and SDADS. Pursuant to those purchase orders, the Debtor has unpaid invoices due SDADS for goods and services provided to the Debtor on a post-petition basis. A list of the amounts due, along with copies of the corresponding invoices, are attached hereto. The total amount of SDADS's administrative expense claim against the Debtor is \$238,274.80.

**Reservation of Rights**

SDADS reserves any and all rights it has or may have in law and in equity and any and all rights it has or may have under state and federal law. SDADS further reserves all rights to amend or supplement this proof of claim and to assert any and all additional claims it may have against the Debtor.

<u>Invoice No.</u>	<u>Doc Date</u>	<u>Invoice Amt./Amount Due (US\$)</u>
SDADS00486	CFS53274	-231.34
SDAD00908	2006-10-30	3,561.28
SDAD00950	2007-04-02	22,795.77
SDAD00951	2007-04-02	2,934.00
SDAD00953	2007-04-09	4,630.32
SDAD00955	2007-04-16	2,934.00
SDAD00956	2007-04-20	126,838.66
SDAD00958	2007-04-20	4,401.00
SDAD00966	2007-06-04	3,172.85
SDAD00984	2007-07-19	2,129.04
SDAD00988	2007-08-06	2,934.00
SDAD00990	2007-08-13	2,934.00
SDAD00994	2007-08-27	24,594.06
O-SDADS0001	2008-01-21	8,241.16
CMM-SDADS0017	2008-02-04	26,406.00
	<b>Total:</b>	238,274.80



**DELPHI**

Systems

Date: 2006-10-30

Invoice No.: SDAD00908

**INVOICE & PACKING LIST**

**Ship To:**

Delphi Automotive Interior Systems  
200 Georgesville Rd, Columbus,  
OH, 43228  
Attn: Steve Cecutti  
Tel: 1-614-275-5188/5152  
Fax: 1-614-275-5180

**Ship From:**

Shanghai Delphi Automotive  
Door Systems Co., Ltd.  
No. 401, Mid Fu Te Rd, Waigaoqiao Free  
Trade Zone 200131 P. R. China  
Tel: 86 21 50462288  
Fax: 86 21 50463640

Description (China)	Qty			NW (KG)	GW (KG)	Unit Price (US\$)	Ttl Amount (US\$)
	pcs	Plt	Ctn				
Tailgate Cable 16873511 尾门拉索 (左)	4,000	1		538.000	580	1.18340	4,733.60
Global Rear Compartment Actuator 16888781 汽车门锁执行器	5,376	4		591.360	892	3.8300	20,590.08
Global Rear Compartment Actuator 16888782 汽车门锁执行器	6,720	5		739.200	1,116	4.4300	29,769.60
	16,096	10	-	1,866.560	2,588		55,093.28

Total Quantity(Pcs): 16,096  
Total Package: 10 Pallets - Cartons  
Total Amount(US\$): 55,093.28  
Net Weight(Kg): 1,866.560  
Gross Weight(Kg): 2,588  
Total Measurement(CBM): 13.449  
Original Country: China  
Term: CIF  
Payment Term: T/T  
Freight(US\$): 2,700  
Insurance(us\$): 55  
Sail Date: 2006-10-30

**Signature And Stamp:**

**Date:**

上海德尔福汽车门系统有限公司 发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用



发票代码: 131000410615

发票号码: 70057862

INVOICE

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200 GEORGESVILLE ROAD, COLUMBUS OHIO 43228-2020 USA	付款方式/Terms of Payment T/T
	信用证号/Credit No.
订单号/Order No.	运输方式/Means of Transport and Route BY OCEAN CIP 由/From SHANGHAI 经/Via 至/To COLUMBUS

唛头和箱号/Marks and Numbers	品名/Description	数量/Quantity	单价/Unit Price	总价/Total Amount
16888781	R/C Actr	2,688.00	USD3.83000	USD10,295.04
16888782	R/C Actr	5,376.00	USD4.43000	USD23,815.68
16890834	Cable	31,360.00	USD1.34820	USD42,279.55
16890835	Cable	27,440.00	USD1.34820	USD36,994.61

USDTotal: 113,384.88

电话  
Telephone

传真  
Telefax

电挂  
Telex

开户银行  
Banker

银行账号  
Account No. for USD

(86)02150462288

1730725003

注册地址: 中国上海外高桥保税区富特中路401号

Citibank  
Shanghai Branch

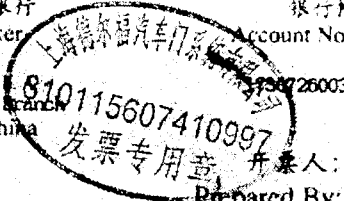
Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China

税号/Tax No.: 310115607410997

工商注册号/Business Register No.: 企合沪浦总字第316223号(浦东)

注: 手工开票无效

Remark: hand Writing Null and Void



开票人: Prepared By:

Wenay Ruan

上海外高桥保税区2004.12.01第5006号(70057862-17058000)

上海德尔福汽车门系统有限公司 发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用



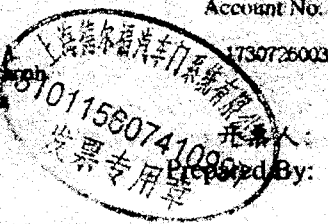
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订单号/Order No.	BY: OCEAN CIF 由/From SHANGHAI 经/Via 至/To COLUMBUS

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16887772	Striker Spacer	36,000.00	USD0.08150	USD2,934.00

USDTotal: 2,934.00

电话 Telephone	传真 Telefax	电挂 Telex	开户银行 Banker	银行帐号 Account No. for USD
(86)02150462288	1730726003		Citibank N.A. Shanghai Branch	1730726003
注册地址: 中国上海外高桥保税区富特中路401号 Address: 401 Fu Te Zhong Road, Wai Gao-Qiao Free Trade Zone, Shanghai, China				
税号/Tax No.: 310115607410997				
工商注册号/Business Register No.: 企合沪浦总字第316223号(浦东)				
注: 手工开票无效 Remark: hand Writing Null and Void				



开票人: Moray. Ruan  
Prepared By:

上海德尔福汽车门系统有限公司 发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用



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订单号/Order No.	

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16887772	Striker Spacer	36,000.00	USD0.08150	USD2,934.00

USDTotal: 4,630.32

电话 Telephone (86) 021 50462288  
传真 Telefax 1730720003  
电挂 Telex  
开户银行 Banker Citibank N.A. Shanghai Branch  
银行帐号 Account No. for USD 1730720003  
注册地址: 中国上海外高桥保税区富特中路401号  
Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China  
税号/Tax No.: 310115607410997  
工商注册号/Business Register No.: 全合沪浦总字第316223号(浦东)  
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上海德尔福汽车门系统有限公司 发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用



发票代码: 131000410615  
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订单号/Order No.	运输方式/Means of Transport and Route BY OCEAN CIF 由/From SHANGHAI 经/Via 至/To COLUMBUS

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USDTotal: 2,934.00

电话 Telephone	传真 Telefax	电挂 Telex	开户银行 Banker	银行账号 Account No. for USD
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(86) 021 50462238  
注册地址: 中国上海外高桥保税区富特中路401号

Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China

税号/Tax No.: 310115607410997

工商注册号/Business Register No.: 企合沪浦总字第316223号(浦东)

注: 手工开票无效

Remark: hand Writing Null and Void

Citibank N.A.  
Shanghai Branch

10115607410997

发票专用章开票人:

Prepared By: Moray. Ruan

上海德尔福汽车门系统有限公司 发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用



发票代码: 131000410615

发票号码: 70057866

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	信用证号/Credit No.
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订单号/Order No.	

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USDTotal: 126,838.66

电话 Telephone 1730726003  
传真 Telefax 1730726003  
电挂 Telex  
开户银行 Banker Citibank N.A. Shanghai Branch  
银行帐号 Bank Account No. for USD 310115607410997  
注册地址: 中国上海外高桥保税区富特中路401号  
Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China  
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工商注册号/Business Register No.: 企合沪浦总字第316223号(浦东)  
注: 手工开票无效  
Remark: hand Writing Null and Void  
Prepared By: Moray. Ruan

上海德尔福汽车门系统有限公司 发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用

INVOICE

发票代码: 131000410615  
发票号码: 70057870

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买方/Buyer DELPHI COLUMBUS OPERATIONS	合同号/Contract No.
200 GEORGESVILLE ROAD, COLUMBUS OHIO 43228-2020 USA	付款方式/Terms of Payment T/T
	信用证号/Credit No.
订单号/Order No.	运输方式/Means of Transport and Route BY OCEAN CIP 由/From SHANGHAI 经/Via 至/To COLUMBUS

唛头和箱号/Marks and Numbers	品名/Description	数量/Quantity	单价/Unit Price	总价/Total Amount
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USDTotal: 4,401.00

电话 Telephone	传真 Telefax	电挂 Telex	开户银行 Banker	银行账号 Account No. for USD
(86) 02150462288	1730726003		Citibank N.A. Shanghai Branch	310115607410997
注册地址: 中国上海外高桥保税区富特中路401号 Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China				
税号/Tax No.: 310115607410997				
工商注册号/Business Register No.: 企合沪浦总字第316223号(浦东)				
注: 手工开票无效 Remark: hand Writing Null and Void				
				开票人: Prepared By: Moray Ruan

上海外高桥保税区富特中路401号 12:50:00 1730726003 70057870 1730726003

上海德尔福汽车门系统有限公司 发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用



发票代码: 131000410615

发票号码: 70057879

买方/Buyer DELPHI COLUMBUS OPERATIONS 200 GEORGESVILLE ROAD, COLUMBUS OHIO 43228-2020 USA	发票编号/Invoice No. SDAD00986
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	合同号/Contract No.
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	信用证号/Credit No.
运输方式/Means of Transport and Route	BY OCEAN CIP
订单号/Order No.	由/From SHANGHAI 经/Via 至/To COLUMBUS

唛头和箱号/Marks and Numbers	品名/Description	数量/Quantity	单价/Unit Price	总价/Total Amount
16890834	Cable	27,440.00	USD1.34820	USD36,994.61
16890835	Cable	27,440.00	USD1.34820	USD36,994.61
16890861	R/C Actr	9,408.00	USD3.87600	USD36,465.41
16890862	R/C Actr	20,160.00	USD4.47500	USD90,236.16

USDTotal: 200,690.79

电话  
Telephone

传真  
Telefax

电挂  
Telex

开户银行  
Banker

银行帐号  
Account No. for USD

注册地址: 中国上海外高桥保税区富特中路401号

Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China

税号/Tax No.: 310115607410997

工商注册号/Business Register No.: 企合沪浦总字第316223号(浦东)

注: 手工开票无效

Remark: hand Writing Null and Void

Cibibank (China)  
Co., Ltd. sh

1730726003



开票人: Moray  
Prepared By:



上海德尔福汽车门系统有限公司发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用

INVOICE

发票代码: 131000410615

发票号码: 70057902

买方/Buyer DELPHI COLUMBUS OPERATIONS  200 GEORGEVILLE ROAD, COLUMBUS OHIO 43228-2020 USA	发票编号/Invoice No. SDAD00984
	发票日期/Date 2007-7-19 Shanghai
	合同号/Contract No.
	付款方式/Terms of Payment T/T
	信用证号/Credit No.
订单号/Order No.	运输方式/Means of Transport and Route
	By Ocean CIP 由/From 经/Via 至/To Shanghai Columbus
唛头和箱号/Marks and Numbers 品名/Description 数量/Quantity 单价/Unit Price 总价/Total Amount	
16889946	R/C Actr 240.00 8.87100 2,129.04

Total: 2,129.04

电话  
Telephone

传真  
Telefax

电挂  
Telex

开户银行  
Banker

银行帐号  
Account No. for USD

注册地址: 中国上海外高桥保税区富特中路 401 号

Cibibank (China)  
Co., Ltd. sh

1730726003

Address: 401 Fu Te Zhong Road, Wai Guo Qiao Free Trade Zone, Shanghai, China

税号/Tax No.: 310115607410997

工商注册号/Business Register No.: 企合沪浦总字第 316223 号 (浦东)

注: 手工开票无效

Remark: hand Writing Null and Void

开票人: Michael  
Prepared By:

**DELPHI**  
Systems

**DELPHI**  
Systems

Date: 2007-8-6  
Invoice No.: SOAD00988

## INVOICE & PACKING LIST

### Ship To:

Delphi Automotive Interior System:  
200 Georgesville Rd, Columbus,  
OH, 43228  
Attn: Steve Cecutti  
Tel: 1-614-275-5188/5152  
Fax: 1-614-275-5180

### Ship From:

Shanghai Delphi Automotive  
Door Systems Co., Ltd.  
No. 401, Mid Fu Te Rd, Waigaoqiao Free  
Trade Zone 200131 P.R. China  
Tel: 86 21 50462288  
Fax: 86 21 50463746

Description (Columbus)	Description (China)	Qty		NW	GW	Unit Price	Total Amount
		pcs	Pkt	(KG)	(KG)	(US\$)	(US\$)
Striker Spacer 16887818垫片	Striker Spacer 16887772 垫片 7772	36.000	2	1,026.000	1,101	0.0815	2,934.00
Total	Total	36,000	2	1,026,000	1,101		2,934.00

Total Quantity(Pcs): 36,000  
Total Package: 2 pallets  
Total Amount(US\$): 2,934.00  
Net Weight(Kg): 1,026,000  
Gross Weight(Kg): 1,101  
Total Measurement(CBM): 0.528  
Original Country: China  
Term: CIF  
Payment Term: T/T  
Freight(US\$): 60  
Insurance(us\$): 87  
Sail Date: 2007-8-6

Signature And Stamp:  
Date

**DELPHI**  
Systems

**DELPHI**  
Systems

Date: 2007-8-13  
Invoice No.: SDAD00990

## INVOICE & PACKING LIST

### Ship To:

Delphi Automotive Interior System:  
200 Georgesville Rd.Columbus,  
OH.43228  
Attn: Steve Cecutti  
Tel: 1-614-275-5188/5152  
Fax: 1-614-275-5180

### Ship From:

Shanghai Delphi Automotive  
Door Systems Co., Ltd.  
No.401,Mid Fu Te Rd,Waigaoqiao Free  
Trade Zone 200131 P.R. China  
Tel: 86 21 50462288  
Fax: 86 21 50463746

Description (Columbus)	Description (China)	Qty		NW	GW	Unit Price	Ttl Amount
		pcs	Plt	(KG)	(KG)	(US\$)	(US\$)
Striker Spacer 16887535垫片	Striker Spacer 16887820 垫片7820	18,000	1	597.780	635	0.0815	1,467.00
Striker Spacer 16887818垫片	Striker Spacer 16887772 垫片7772	18,000	1	513.000	551	0.0815	1,467.00
Total	Total	36,000	2	1,110.780	1,186		2,934.00

Total Quantity(Pcs): 36,000  
Total Package: 2 pallets  
Total Amount(US\$): 2,934.00  
Net Weight(Kg): 1,110.780  
Gross Weight(Kg): 1,186  
Total Measurement(CBM): 0.528  
Original Country: China  
Term: CIF  
Payment Term: T/T  
Freight(US\$): 60  
Insurance(us\$): 87  
Sail Date: 2007-8-13

Signature And Stamp:

Date

上海德尔福汽车门系统有限公司发票  
Shanghai Delphi Automotive Door Systems Co., Ltd.

出口专用

INVOICE

发票代码: 131000410615

发票号码: 70057922

	发票编号/Invoice No. SDAD00004 发票日期/Date 2007-8-27 Shanghai
买方/Buyer DELPHI COLUMBUS OPERATIONS  200 GEORGESVILLE ROAD, COLUMBUS OHIO 43228-2020 USA	合同号/Contract No. 550022271 付款方式/Terms of Payment T/T 信用证号/Credit No. 运输方式/Means of Transport and Route By Ocean CIP 由/From Shanghai 经/Via 至/To Columbus
订单号/Order No.	

唛头和箱号/Marks and Numbers	品名/Description	数量/Quantity	单价/Unit Price	总价/Total Amount
16887753	Lever	14,400.00	0.11780	1,696.32
16887820	Striker Spacer	206,000.00	0.08150	24,939.00
16887772	Striker Spacer	162,000.00	0.08150	13,203.00

Total: 39,838.32

电话 Telephone	传真 Telefax	电挂 Telex	开户银行 Banker	银行帐号 Account No. for USD
-----------------	---------------	-------------	----------------	-----------------------------

注册地址: 中国上海外高桥保税区富特中路401号

Address: 401 Fu Te Zhong Road, Wai Gao Qiao Free Trade Zone, Shanghai, China

税号/Tax No.: 310115607410997

工商注册号/Business Register No.: 企合沪浦总字第316223号 (浦东)

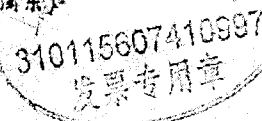
注: 手工开票无效

Remark: hand Writing Null and Void

Cibibank (China)  
Co., Ltd. sh

1730726003

开票人: Michael  
Prepared By:



**DELPHI**

Systems

Date: 2008-1-21

Invoice No.: O-SDADS0001

## INVOICE & PACKING LIST

### Ship To:

DELPHI T & I ORION  
Orion Cockpit Assembly 4872 S .Lapeer Road  
ORION MI 48360 UNITED STATES  
Attn:Kelley, Kevin  
Phone :+1 248-655-8820  
Fax : +1 866-746-9161

### Ship From:

Shanghai Delphi Automotive  
Door Systems Co., Ltd.  
No.401,Mid Fu Te Rd,Waigaoqiao Free  
Trade Zone 200131 P.R. China  
Tel: 86 21 50462288  
Fax: 86 21 50463746

Description	Qty		NW	GW	Unit Price	Ttl Amount
	pcs	Plt	(KG)	(KG)	(US\$)	(US\$)
Striker Spacer 16887820 垫片7820	108,000	6	3,587.000	3,813	0.0815	8,802.00
Striker Spacer 16887772 垫片7772	216,000	12	6,156.000	6,609	0.0815	17,604.00
<b>Total</b>	<b>324,000</b>	<b>18</b>	<b>9,743.000</b>	<b>10,422</b>		<b>26,406.00</b>

Total Quantity(Pcs): 324,000  
Total Package: 18 pallets  
Total Amount(US\$): 26,406.00  
Net Weight(Kg): 9,743.000  
Gross Weight(Kg) 10,422  
Total Measurement(CBM): 4.752  
Original Country: China  
Term: CIF  
Payment Term: T/T  
Freight(US\$): 800  
Insurance(us\$): 520  
Sail Date: 2008-1-21

**Signature And Stamp:**

Date:

**DELPHI**

Systems

Date: 2008-2-4

Invoice No: CMM-SDADS0017

**INVOICE & PACKING LIST**

**Ship To:**

Delphi I CISC0 39701  
DCMM Brownsville Warehouse,  
3301 Nafta Parkway, Brownsville, TX. 78521, USA  
Contact: Raul Velazquez  
Tel: 1-956-228-1818

**Ship From:**

Shanghai Delphi Automotive  
Door Systems Co., Ltd.  
No 401, Mid Fu Te Rd, Waigaoqiao Free  
Trade Zone 200131 P.R. China  
Tel: 86 21 50462288  
Fax: 86 21 50463640

Description (China)	Qty			NW (KG)	GW (KG)	Unit Price (US\$)	Ttl Amount (US\$)
	pcs	Plt	Ctn				
Tailgate Cable PU 900 16890834 尾门拉索 (右) 900	15,680	4		2,210.880	2,430	1 3482	21,139.78
Tailgate Cable PU 900 16890835 尾门拉索 (左) 900	15,680	4		2,210.880	2,430	1 3482	21,139.78
Tailgate Cable UUV 900 16890832 尾门拉索 (右) 900	3,920	1		560.560	615	1.3657	5,353.54
Tailgate Cable UUV 900 16890833 尾门拉索 (左) 900	3,920	1		560.560	615	1.3657	5,353.54
Global Rear Compartment Actuator 16890861 汽车门锁执行器	18,816	14		2,069.760	3,123	3 8760	72 930.82
Global Rear Compartment Actuator 16890862 汽车门锁执行器	8,064	6		887.040	1,341	4 4760	36,094.46
<b>TOTAL</b>	<b>66,080</b>	<b>30</b>	<b>-</b>	<b>8,499.680</b>	<b>10,554</b>		<b>162,011.92</b>

Total Quantity(Pcs) 66,080  
Total Package: 30 Pallets - Cartons  
Total Amount(US\$): 162,011.92  
Net Weight(Kg): 8,499.680  
Gross Weight(Kg): 10,554  
Total Measurement(CBM): 37.588  
Original Country: China  
Term: CIF  
Payment Term: T/T  
Freight(US\$): 4,000  
Insurance(us\$): 4,101  
Sail Date: 2008-2-4

**Signature And Stamp:**

**Date:**

**FOLEY & LARDNER LLP**

JUDY A. O'NEILL (admitted *pro hac vice*)

DEREK L. WRIGHT

321 N. Clark Street, Suite 2800

Chicago, IL 60654-5313

Telephone: 312.832.4500

Facsimile: 312.832.4700

joneill@foley.com

dlwright@foley.com

Attorneys for Shanghai Inteva Automotive Door Systems Company, Ltd.

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re:	)	Chapter 11
	)	
DPH HOLDINGS CORP., et al.,	)	Case No. 05-44481 (RDD)
	)	
Reorganized Debtors.	)	(Jointly Administered)
	)	

**CERTIFICATE OF SERVICE**

I hereby certify that on January 13, 2010, I caused to be electronically filed with the United States Bankruptcy Court for the Southern District of New York, the SHANGHAI INTEVA AUTOMOTIVE DOOR SYSTEMS COMPANY, LTD.'S RESPONSE TO REORGANIZED DEBTORS' FORTY-FIRST OMNIBUS OBJECTION PURSUANT TO 11 U.S.C. § 503(B) AND FEDERAL RULE OF BANKRUPTCY PROCEDURE 3007 TO EXPUNGE CERTAIN (A) SEVERANCE CLAIMS AND (B) BOOKS AND RECORDS CLAIMS ASSERTING ADMINISTRATIVE EXPENSES, using the ECF system which will send notification of such filing to registered users in the case and caused to be served via overnight delivery on the following at the addresses set forth below:

Honorable Robert D. Drain  
United States Bankruptcy Judge  
United States Bankruptcy Court for the  
Southern District of New York  
The Hon. Charles L. Brieant Jr. Federal Building  
and Courthouse  
300 Quarropas Street  
Courtroom 118  
White Plains, NY 10601-4140

DPH Holdings Corp.  
5725 Delphi Drive  
Troy, Michigan 48098  
Att'n: President

Counsel to the Reorganized Debtors  
Skadden, Arps, Slate, Meagher & Flom LLP  
155 North Wacker Drive  
Chicago, Illinois 60606  
Att'n: John Wm. Butler, Jr.  
John K. Lyons  
Joseph N. Wharton

SHANGHAI INTEVA AUTOMOTIVE  
DOOR SYSTEMS COMPANY, LTD.

By: /s/ Judy A. O'Neill  
One of Its Attorneys

FOLEY & LARDNER LLP  
Judy A. O'Neill  
Derek L. Wright  
321 North Clark Street  
Suite 2800  
Chicago, Illinois 60654  
Telephone: (312) 832-4500  
Facsimile: (312) 832-4700